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Attorney for JUDGMENT CREDITOR
AND LIEN CLAIMANT BROZYNSKI
& DALTON PC

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

OPULENT TREASURES, INC.,

Plaintiff,

v.

YA YA CREATIONS, INC. et al.

Defendants.

Case No. 2:22-cv-6137-SSS-JC

Consolidated with Case No. 2:22-cv-2616-SSS-JCx

**JUDGMENT CREDITOR AND
LIEN CLAIMANT BROZYNSKI
& DALTON, P.C.'S OBJECTION
TO JOINT STATUS REPORT**

YA YA CREATIONS, INC.

Plaintiff,

v.

OPULENT TREASURES, INC.,

Defendant.

Date: December 19, 2025

Time: 1:00pm

Courtroom: 2 (Judge Sykes)

1 Judgment Creditor and Lien Claimant Brozynski & Dalton, P.C. objects to
2 Plaintiff Opulent Treasures Inc.'s proposed settlement described in the Joint Status
3 Report (ECF No. 180), which de facto diverts funds from Brozynski & Dalton a
4 priority creditor, to Opulent's current attorneys.

5 Opulent owes Brozynski & Dalton, P.C. more than \$517,978.24 for unpaid
6 legal fees, costs, and 10% accrued interest under judgments in both Texas and
7 California. Despite these judgments, Opulent refuses to pay any portion towards
8 satisfying this amount. Opulent is now asking the Court to approve a settlement
9 that redirects funds to its own counsel rather than to Brozynski & Dalton.

10 In 2023, Brozynski & Dalton filed an arbitration claim against Opulent to
11 recover fees and costs for its prior legal work for the company. Opulent responded
12 by accusing Brozynski & Dalton of malpractice and breach of fiduciary duty. The
13 case went to arbitration before a three-person panel in Dallas, Texas, in January
14 2024. The panel ruled unanimously in favor of Brozynski & Dalton and dismissed
15 all of Opulent's counterclaims. Ex. 1.

16 Following arbitration, Brozynski & Dalton confirmed the award in Texas
17 state court, obtaining a judgment for \$444,033.12. Ex. 2. Brozynski & Dalton then
18 domesticated this judgment in California under Code of Civil Procedure §1710.25.
19 Ex. 3. On July 10, 2025, Brozynski & Dalton filed a notice of judgment lien in
20 2:22-cv-2616-SSS-JCx (Ex. 4 and ECF No. 341) and in consolidated Case No.
21 2:22-cv-6137-SSS-JCx (Ex. 5 and ECF No. 166). Opulent did not submit any
22 exemption claim.

23 Brozynski & Dalton, as Opulent's judgment creditor, can use various
24 methods to collect the amount owed. One option under California law is Code of
25 Civil Procedure section 708.510, which allows a creditor to ask a court to order
26 that any licensing fees a third party owes to a judgment debtor be assigned directly
27 to the creditor.

28 Here, Opulent is proposing a settlement that would have Defendant Ya Ya
Creations pay licensing fees to Opulent's counsel, who would then take a "licensing
agent fee." ECF No. 180. Opulent does not explain why its counsel deserves this

1 fee or even why such a fee is necessary. If this fee is meant to cover unpaid legal
2 fees, Opulent's counsel has not provided proof that it has a valid lien on those fees
3 or that its lien takes priority over Brozynski & Dalton's lien. For these reasons,
4 Brozynski & Dalton objects to any settlement that would divert funds owed under
5 its judgment.

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7 Dated: December 10, 2025

8 BROZYNSKI & DALTON PC

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10 By: /s/ Bart Dalton
11 BART DALTON
12 Attorney for JUDGMENT CREDITOR
13 BROZYNSKI & DALTON PC
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